CITY COUNCIL

Pedro "Pete" M. Sanchez, Mayor Jane Day, Mayor Pro-Tem Sam Derting Michael J. Hudson Michael A. Segala



CITY COUNCIL MEETING

First and Third Tuesday
Every Month

701 Civic Center Blvd. Suisun City, California 94585

Incorporated October 9, 1868

January 28, 2011

VIA E-Mail: Dale Bowyer dbowyer@waterboards.ca.gov

Bruce Wolf, Executive Director California Regional Water Quality Control Board San Francisco Bay Region 1515 Clay Street, Suite 1400 Oakland, CA 94612

RE: Comment Special Projects Proposal/LID Treatment Reduction Credits MRP Provision C.3.e.ii.(2)

Dear Mr. Wolf;

On behalf of the City of Suisun City this letter is intended to respond to the BASMAA Special Projects Proposal/LID Treatment Reduction Credits for Municipal Regional Permit (MRP) Provision C.3.e.ii(2). We appreciate the opportunity to comment on this regional effort to achieve the collective goals of encouraging sustainable infill projects while developing effective strategies to address water quality concerns. We ask that you please adopt the BASMAA proposal as an important step to modify the MRP to encourage a regional emphasis on smart growth.

We are living in a new economic reality from when the MRP was adopted in 2009. At that time we could not have foreseen the depth of this extended recession or the toll it would take on state funding, local governments, regional jobs and programs. The BASMAA Proposal is a first step to encourage and support sustainable growth strategies across the Bay Area. Projects as defined in the Special Project categories will support smart growth development patterns appropriate to push the boundaries of sustainable development in areas served by member municipalities ranging from rural ranchland, to suburban and mid size cities, to high density urban areas – all communities with a shared struggle to revitalize.

The many environmental benefits that compact, infill, and redevelopment projects can yield should be encouraged by allowing greater flexibility in the treatment of stormwater runoff. The use of tree well, sand filter, and mechanical vault filtration systems in development projects that meet local or regional sustainable growth objectives can offer a critical balance between water quality benefits and achieving other beneficial environmental objectives by creating less accessory impervious areas and auto-related pollutant impacts. Incentivizing LID treatment

reduction credits should be applied to these types of Special Projects. Without these important considerations the MRP will encourage low density development where bioretention, infiltration, and evapotranspiration are feasible.

We ask that you please adopt the BASMAA proposal as an important first step to modify the MRP and bring Water Board policy in line with the Federal, State, and regional emphasis on smart growth.

We appreciate your time and consideration, and look forward to working with your staff and Board Members to further our mutual understanding of this Proposal.

Best regards,

Suzanne Bragdon City Manager

City of Suisun City